



June 10, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ET Docket No. 14-165 Comments

Dear Ms. Dortch:

JAB Wireless, Inc. dba Rise Broadband (Rise Broadband) submits these Comments in support of Microsoft's petition for rulemaking to amend the TV white space rules.

As background, Rise Broadband is the largest privately held provider of fixed wireless broadband services in the country. We serve residential and business customers in 16 states, using unlicensed spectrum primarily in 5 GHz, licensed 2.5 GHz spectrum and "lightly licensed" spectrum in the 3650-3700 MHz band. We recently deployed service in TV white space spectrum in Illinois working with the Microsoft Airband Initiative through the Airband ISP Program. Its low-band propagation characteristics uniquely enable us to deliver non-line-of-sight service in very remote and rural areas where the need to close the digital divide is greatest.

With rule changes to increase the utility and reach of TV white space spectrum, we believe that this band can be a significant component of Rise Broadband's rural fixed wireless spectrum architecture. This will in turn give a jolt to the equipment ecosystem, making equipment more competitive and affordable, and making the business case a reality for service providers. The rule changes proposed increase the likelihood that TV white space networks can be a cost-effective solution for reaching into unserved and underserved rural areas with a broadband level service.

In addition to the rules that Microsoft proposes, our experience suggests that the FCC would be wise to consider changes to its out-of-band emission rules. Because of the tight mask, current TV white space radio manufacturers must operate their radios at reduced transmit power making it realistically impossible to meet EIRP limits with current radio hardware. This severely limits coverage radius and the ability to overcome noise in the band. It also makes the business case much more difficult. We encourage the FCC to invite comment on relaxing the out-of-band emission limits in connection with the rulemaking proceeding.

Rise Broadband looks forward to further engagement in the rulemaking proceeding to make the band more useful for rural broadband deployment.

Sincerely,

/s/ Jeff Kohler

Jeff Kohler

Co-Founder and Chief Development Officer